

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 20-30028-MGM
	)	
v.	)	
	)	
JAMES LAFRANCE	)	

INITIAL STATUS CONFERENCE MEMORANDUM

The United States of America, by and through its attorneys, United States Attorney Andrew E. Lelling and Assistant United States Attorney Alex J. Grant, and the defendant James LaFrance, by and through his attorney, Timothy Watkins, submit this memorandum to address the issues delineated in 116.5(a)(1)-(8).

1. The government has just recently made its automatic disclosures. The defense has not had a chance yet to make any discovery requests.

2. The government has made the child pornography evidence available for review and the government is attempting to secure a few additional documents to produce to the defense.

3. The defendant may make additional discovery requests in the future based on the defendant's review of the automatic discovery.

4. A proposed protective order is attached.

5. The defense is not yet in a position to decide whether it will file dispositive motions.

6. The parties wish for a schedule for expert witness disclosures to be established at a subsequent status conference.

7. The parties request that the Court enter an order of excludable delay under the Speedy Trial Act from October 20, 2020 until December 21, 2020 and from December 21, 2020

until the date of the next hearing. These continuances are necessary to allow the defense time to decide whether to opt into automatic discovery, for the government to produce automatic discovery, and for the defense counsel to review automatic discovery. This exclusion would serve the “ends of justice” within the meaning of 18 U.S.C. § 3161(h)(7)(A) and are authorized by Local Rule 112.2. A proposed order is attached.

8. The government requests that an interim status conference be set for 45 to 60 days after the initial status conference.

Respectfully submitted,

ANDREW E. LELLING  
UNITED STATES ATTORNEY

By: /s/ Alex J. Grant  
Alex J. Grant  
Assistant United States Attorney

JAMES LAFRANCE

By: /s/ Timothy Watkins  
Timothy Watkins  
Counsel for James LaFrance

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Alex J. Grant  
ALEX J. GRANT  
Assistant United States Attorney